

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8 1595 WYNKOOP STREET DENVER, COLORADO 80202 http://www.epa.gov/region8



Ref: 8ENF-RC

June 28, 2007

Mr. Jon Nickel ASARCO East Helena Plant 100 Smelter Road P.O. Box 1230 East Helena, MT 59635

RE: ASARCO East Helena Smelter, Abandonment of Underground Pipelines, Utilities, and Structures

Dear Mr. Nickel:

EPA is marginally aware that you are proceeding with the in-place abandonment of underground pipelines, utilities, and structures. Even though this clearly falls under federal corrective action authority at the site, a formal proposal to conduct this work has not submitted to EPA for our review and approval.

The physical condition, location, and contaminant level of these items has not been presented to EPA. Please be aware that future work to access and address these areas will be a necessary component of the Phase 2 RCRA Facility Investigation Work and Corrective Measures Study.

If you should have questions on this or any related matter, please contact me.

Sincerely,

Linda Jacobson

RCRA Enforcement

cc: Charles Figur, EPA-L
Thomas Aldrich, ASARCO
Mark Hall, MDEQ